

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,	)	CIVIL NO.04-00502 DAE BMK
a Hawaii nonprofit corporation;	)	
NA IMI PONO, a Hawaii	)	DECLARATION OF COLONEL
unincorporated association; and	)	
KIPUKA, a Hawaii unincorporated	)	STEFAN J. BANACH
association,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
DONALD H. RUMSFELD, Secretary	)	
of United States Department of	)	Hearing:
Defense; and LES BROWNLEE,	)	
Acting Secretary of the United	)	Date: November 20, 2006
States Department of the Army,	)	Time: 9:45 AM
	)	Judge: Hon. David A. Ezra
Defendants.	)	

DECLARATION OF COLONEL STEFAN J. BANACH

I, Colonel Stefan Banach, hereby declare that:

1. I am the Commander of the 2nd Stryker Brigade Combat Team, 25<sup>th</sup> Infantry Division and U.S. Army Hawaii ("2/25 SBCT"). In this capacity, I am responsible for the day to day training, health, and welfare activities of the 3,999 Soldiers that are authorized for this brigade and also for their family members. For the reasons noted below, stopping or disrupting the transformation of the 2/25 SBCT would have a devastating impact on the preparation for the likely execution of combat operations that are planned for Iraq in

early 2008. Any disruption of the already constrained transformation and training timeline that we are using, designed to achieve full operational capability in November 2007, will result in a combat ineffective unit and inadequately trained Soldiers, which will jeopardize Soldiers' lives in combat.

2. Personal Background. I have served as a commander at all echelons of military command up to Brigade command (17 months in my current position). I had forty-eight months of tactical battalion command which included command of the 3d Ranger Battalion from June 2001 - June 2003. This command tour included two deployments to Afghanistan and one deployment to Iraq in support of Operation Enduring Freedom and Operation Iraqi Freedom, respectively. During this assignment, I led U.S. Army Rangers during the execution of a combat parachute assault on 19 October 2001 into Afghanistan as the spearhead for the Global War on Terrorism and participated in a second parachute assault into Iraq during the initial phase of Operation Iraqi Freedom in March 2003.

The Rangers that I was fortunate to command and lead in combat during the three deployments noted above were the best trained and most well led Soldiers in our Army. Despite these advantages, I had five Rangers killed in action and over thirty more wounded in action during the execution of these combat operations. The point of emphasis for all is that we had continuity in our training plans; we were fully resourced and we had continuity in all aspects of our combat

preparedness and we still lost five great Rangers and over thirty more Rangers were severely wounded. Interrupting the current 2/25 SBCT transformation and training plans will have second and third order affects that will be measured in the blood of our Soldiers that will be shed needlessly on the battlefield in Iraq. Our young Soldiers, their spouses and the children of our service members will pay an enormous cost and will suffer hardship that none of us can fully comprehend. I have personally lived through enough of this to know that any disruption of our current training plan will get many more of our Soldiers killed and wounded in combat than if we were able to maintain continuity in our current training and transformation plan to a fully combat ready Stryker Brigade Combat Team. To be clear, any delays or disruptions to the training program of the Soldiers in the 2/25 SBCT as we prepare for war will have a devastating impact on the well being of our Soldiers and their respective family members.

My initial assignment in the military was with the 2d Battalion, 505th (Abn) Infantry, 82d Airborne Division. After this tour, I was assigned to the 1st Ranger Battalion, Hunter Army Airfield, Savannah, Georgia, as a Ranger Rifle Platoon Leader from 1985 - 1987. I later attended the U.S. Army Infantry Officer Advanced Course at Fort Benning, Georgia, in 1987, and graduated as the Distinguished Honor Graduate. I was then assigned to the 1st Battalion, 18th Infantry, 197th Mechanized Brigade (Separate), at Fort Benning where I commanded



Company B, 1st Battalion, 18th Infantry, from 1989 - 1991. This command tour included a combat deployment to Iraq with the 24th Infantry Division (Mechanized) in support of Operations Desert Shield & Desert Storm. I later served as a Liaison Officer with the 75th Ranger Regiment at Fort Benning and as the Battalion Adjutant for 1st Ranger Battalion at Hunter Army Airfield from 1991 - 1993. I then attended the Command and General Staff College at Fort Leavenworth, Kansas, and was assigned to 2d Ranger Battalion at Fort Lewis, Washington, as the Battalion Liaison Officer, Operations Officer and Executive Officer from 1994-1997. This assignment included a deployment to Haiti in support of "Operation Uphold Democracy." I was then assigned to the United States Pacific Command in Hawaii, where I served from June 1997 - June 1999. Following that assignment, I commanded the 3d Battalion, 15th Infantry (Mechanized), 3d Infantry Division, Fort Stewart, Georgia, from July 1999 - June 2001. This battalion command tour included a deployment to Bosnia in support of Stabilization Force 8, "Operation Joint Forge."

I graduated from the Advanced Operational Arts Studies Fellowship at the School of Advanced Military Studies (SAMS) at Fort Leavenworth, Kansas in May 2005 and assumed command of the 2d Brigade, 25th Infantry Division (Stryker) on 25 May 2005 at Schofield Barracks, Hawaii. My awards and decorations include the Legion of Merit, Bronze Star with Valor Device, Bronze Star Medal for Service, Defense Meritorious

Service Medal, U.S. Army Ranger Tab, Master Parachute Badge (With Two Gold Combat Jumps Stars) and Combat Infantry Badge (two awards). I have an undergraduate degree from the University of Iowa and a Masters Degree from the Command & General Staff College at Fort Leavenworth.

3. Transformation of 2nd BDE to a SBCT. The 2nd Brigade was identified for transformation to a SBCT by the Secretary of the Army in July 2001 and directed to transform as part of the Army Transformation Plan. The Army Transformation Plan, now the Army Campaign Plan, calls for the organizing, equipping, and fielding of the entire Army into new modular Units of Action called Brigade Combat Teams (BCTs) that are more independent, deployable and lethal. The SBCTs are designed to serve as a bridge between the current force and the Objective Force by providing more independent, mobile and lethal units than the current forces while the future combat system and brigades are being developed.

4. Pending Deployment. The 2/25 SBCT is integral to the Department of the Army's Campaign Plan and is expected to deploy at some point during the next sixteen months in support of the Global War on Terrorism. The Brigade must complete a series of training and certification events prior to a deployment as a SBCT. This training is multifaceted and includes all aspects of combat, combat support, and command & control that the SBCT will be expected to execute during combat operations. The major areas of training

include Brigade, Battalion and Company level field training exercises (FTXs), platoon and squad-level situational exercises, combat focused shooting and maneuver live-fire exercises, Drivers Training, Medical Training, Digital Training, and Equipment & Vehicle Maintenance Training. These training events are essential and will better prepare Soldiers and leaders for complex and violent combat situations, such as the execution of direct action raids, vehicle ambushes, Improvised Explosive Device (IED) attacks, and rocket and mortar attacks, which they will encounter during a deployment in support of the Global War on Terror.

5. Pre-deployment SBCT Training Requirements. The 2nd Brigade began its transformation to an SBCT in October 2005. Prior to that, the Brigade returned from Iraq in January and February 2005, Soldiers took leave, transferred to their next assignment or left the service, as appropriate, and new Soldiers came into the SBCT. Beginning in October 2005, the 2nd Brigade became an SBCT and the Soldiers started the individual technical training necessary to be an SBCT soldier. The SBCT is the most automated, complex, technologically advanced and powerful brigade level organization in the Army. Every Stryker vehicle has a computer system that allows for unparalleled situational awareness which is paramount to saving lives in combat. The Stryker vehicle has the capability to continuously monitor its location, the rest of the friendly force



unit locations and can monitor enemy positions once they are identified. The digital capabilities resident in the Stryker vehicles allows for the processing of weather, targeting, and intelligence data; guiding precision weapons; and communicating using abbreviated computer codes, called bursts, that relay information in a fraction of the time it would take a normal radio call found in the non-digital units in our Army.

To begin the Stryker transformation process our Soldiers initially participate in unit set fielding and new equipment training (NETs) which address the equipment fielding and critical digital training requirements necessary to learn how to use all of the advanced automation equipment. To help with this training, specialized instructional teams called New Equipment Teams (NETs) have come to Hawaii. These NET trainers have helped to train the SBCT transforming in Alaska and the SBCT transforming at Fort Lewis as well as assisting our Stryker Brigade in Hawaii with the necessary transformational training requirements. Therefore, it is essential that the schedule for transformation be adhered to because the NET Teams only have a certain amount of time in which they can assist in the transformation process of 2/25 SBCT in Hawaii. There are other Stryker Brigades that are undergoing this transformation that require this NET training and trainers.

Disrupting or delaying the NET training here in Hawaii would have a cascading effect on other transforming SBCTs.

New equipment training occurs in three phases; each building on the former. As the digital training is accomplished, the SBCT learns to operate its battle command systems at the brigade, battalion and company levels which are known as Tactical Operation Centers.

Formalized digital training has occurred between September 2005 and October 2006; this important digital sustainment training also continues at the unit level throughout the entire time a service member remains in the SBCT given the perishable nature of our digital skills. The tactical operations center training is also continuous with immersion training that is occurring now; we will continue with this important training until this unit deploys to combat in early 2008. Any disruption of this critical training will have immeasurable adverse impacts on the combat readiness of the unit and will put this SBCT in a position of unacceptable risk.

The actual Operational New Equipment Fielding (OPNET) of our Stryker vehicles is the next important step in our transformational process. This training began in July 2006 and will be completed by July 2007 for all individual and collective (unit level) training. The SBCT training culminates with a deployment for training to one of two Army Combat Training Centers (CTCs) to focus on full force



combat operations at the brigade level beginning in September 2007. It is an Army requirement that all BCTs undergo training at a CTC before deployment to combat. It is currently envisioned that this SBCT will deploy in September 2007 to the National Training Center at Fort Irwin, California to conduct specific unilateral training in preparation for the Army Mission Readiness Exercise (MRX) in October 2007 that will validate the unit for the anticipated combat deployment in early 2008. The CTCs provide unparalleled feedback through the use of instrumentation and Observer Controllers that are only available at the CTC. Every brigade in the Army culminates its preparation for combat operations at a CTC. Key to the success of the Mission Readiness Exercise (MRX) that will be conducted at the CTC at Fort Irwin, California, is the home station (Hawaii) training. The degree of success at the MRX and during combat operations is attributable to the quality of training at home station.

6. 2/25 SBCT Transformation Activities. Transformation of 2/25 SBCT is fully underway. The 2<sup>nd</sup> Brigade no longer exists as a light infantry brigade. It returned from Iraq in February 2005 after thirteen months of combat and immediately began transformation to an SBCT. The transformation process consisted of numerous inter-dependent activities conducted to achieve the overall goal of a